

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ROSS UNIVERSITY SCHOOL OF  
MEDICINE, LTD.,

09 Civ. 1410 (KAM) (RLM)

Plaintiff,

**NOTICE OF MOTION**

-- against --

BROOKLYN-QUEENS HEALTH CARE,  
INC. and WYCKOFF HEIGHTS MEDICAL  
CENTER,

Defendants.

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**PLEASE TAKE NOTICE** that Plaintiff Ross University School of Medicine, Ltd., by its attorneys Baker & Hostetler LLP, upon the annexed Local Rule 56.1 Statement of Material Facts, the associated exhibits attached thereto, and the accompanying Memorandum of Law, will move this Court, before the Honorable Kiyo A. Matsumoto, United States District Judge, Eastern District of New York, United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, 11201, for an order pursuant to Fed. R. Civ. P. 56 and Local Civil Rule 56.1 for partial summary judgment and for such other relief as this Court deems proper.

Respectfully submitted,

**BAKER & HOSTETLER LLP**

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*Counsel for Defendants Brooklyn Queens Health Care, Inc.  
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### CERTIFICATE OF SERVICE

I, George J. Tzanetopoulos, attorney for Ross University School of Medicine, Ltd., certify that on December 2, 2011, I caused a true and correct copy of the foregoing **Notice of Motion, Local Rule 56.1 Statement of Material Facts and Appendix, and Memorandum of Law** to be served upon counsel of record listed below by email and by overnight courier:

Walter P. Loughlin  
Justin H. Roeber  
K&L Gates  
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New York, New York 10022-6030

/s/ George J. Tzanetopoulos